

# **Exhibit B**

**From:** Zornberg, Lisa  
**Sent:** Friday, July 02, 2021 11:58 AM  
**To:** 'Tenreiro, Jorge'  
**Cc:** 'Sylvester, Mark'; 'Waxman, Daphna A.'; 'Daniels, Jon'; 'Stewart, Ladan F'; 'Hanauer, Benjamin J.'; 'Moye, Robert M.'; 'Levander, Samuel'; 'Tatz, Nicole'; 'mflumenbaum@paulweiss.com'; 'mgertzman@paulweiss.com'; 'Dearborn, Meredith (mdearborn@paulweiss.com)'; 'Linsenmayer, Robin (rlinsenmayer@paulweiss.com)'; 'Bunting, Kristina' (kbunting@paulweiss.com)'; 'mkellogg@kelloggghansen.com'; Reid Figel; Brad Oppenheimer; Hirsch, Matt; 'Pfeffer, Eliana M. (epfeffer@kelloggghansen.com)'; 'White, Collin R.' (cwhite@kelloggghansen.com)'; Gressel, Anna; Ford, Christopher S.; Ceresney, Andrew J.; Guo, Joy; Gulay, Erol; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Bamberger, Nowell D.'  
**Subject:** RE: For Tomorrow's Meet and Confer

Jorge and all – Defendants are available next Thursday from 1:30 to 2:30 pm, and we’ll send an invite for that time.

On the no-action letter issue that we discussed yesterday, Defendants will agree to the further limitation the SEC proposed and narrow RFP 37 to the following:

All documents submitted to the SEC by third parties from January 1, 2012 through December 22, 2020 requesting no-action letters from the SEC concerning any Digital Asset or Virtual Currency, which in any way mention or refer to *Howey* or Section 5 registration requirements, and all responses by the SEC to the requests of, and communications with, those third parties relating to such requests, or documents sufficient to show that the SEC never responded to the requests.

Please confirm by response email that the SEC will promptly search for and produce responsive materials.

Thank you,  
Lisa